Resolute Forest Products – Catawba Mill
5300 Cureton Ferry Road
Post Office Box 7
Catawba, SC 29704-0007

FED EX NO. 7806 3022 7615

April 23, 2018

Ms. Connie Turner, Manager
Air Toxics Section
SCDHEC Bureau of Air Quality
2600 Bull Street
Columbia SC 29201-1708

Re: MACT II Excess Emissions and Monitoring System Performance Reports
Air Permit No. TV-2440-0005

Dear Ms. Turner:

The purpose of this submittal is to meet the quarterly excess emission reporting requirements applicable to the Resolute Forest Products – Catawba Mill associated with the National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry (40 CFR 63, Subpart MM). The sources covered under Subpart MM are the No. 2 Recovery Boiler, No. 3 Recovery Boiler, No. 2 and No. 3 Smelt Dissolving Tank Vent, and the No. 2 Lime Kiln. This submittal meets the requirements of the Excess Emissions and Continuous Monitoring System (CMS) Performance Report pursuant to Sections 63.867(c) and 63.10(c), respectively.

Excess emissions and CMS downtime for the reporting period were less than 1% and 5% respectively for all systems, except for the No. 2 and No. 3 Smelt Dissolving Tank Vent. Therefore, only the summary reports are attached as allowed in §63.10(e)(3)(vii) for the boilers and lime kiln; a detailed Excess Emissions and Continuous Monitoring System Performance Report is added for the No. 2 and No. 3 Smelt Dissolving Tank Vent.

Excess emissions on the SDTV were the result of unusually sustained artic cold temperatures in January and the result of a mill-wide power loss on 1/17/2018 and the subsequent mill-wide recovery and stabilization of operations from this power loss.

For SSM purposes when an emission has occurred, specific information about the type and duration is reported on the enclosed log(s). All SSM events were consistent with the SSM Plan.

Based on information and belief formed after reasonable inquiry, I certify to the best of my knowledge, that the statements and information in this submission are true, accurate, and complete.

If you have any questions or require additional information, please contact Mike Swanson, environmental engineer at (803) 981-8010 or mike.swanson@resolutefp.com.

Sincerely,

David Clemmons
Pulping & Utilities Operations Manager – Catawba Operations

Enclosures: MACT II Logs
cc: SCDHEC – BAQ, Technical Management Section
Alex Latta, Midlands EA Lancaster
EPA Region 4
Environmental File 232.15

QUARTERLY REPORT SUMMARY

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

Pollutant:	Opacity
Time Period:	Minutes
Reporting Period:	January 1, 2018 through March 31, 2018
Process Unit Description:	No. 2 Recovery Boiler
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	35%
Monitor Manufacturer(s) and Model Number(s):	Teledyne Monitor Labs / Light Hawk 560 Opacity Monitor
Last CMS Certification or Audit Date:	Certification: October 20, 2006 Audit: September 29, 2017
Total Source Operating Time in Reporting Period:	117,547 minutes

EMISSION DATA SUMMARY

Reason for Excess Emissions	**Duration (minutes)**	
	Over 35%	Over 20% for 60 minutes
A. Startup/Shutdown	0	0
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	78	0
Fuel Problems	0	0
Other Known Cause	24	0
Other Unknown Cause	18	0
Total Number of Incidents	6	0
Excess Emissions/Process Operating Time	0.10 %	NA

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	**Duration (minutes)**
Monitor Equipment Malfunctions	589
Non-Monitor Equipment Malfunctions	0
Quality Assurance	48
Other Known Cause	0
Other Unknown Cause	0
Total Number of Incidents	21
Percent Monitor Downtime	0.54 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: David Clemmons Pulping & Utilities Operations Manager

Signature: _____

QUARTERLY REPORT SUMMARY

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

Pollutant:	Opacity
Time Period:	Minutes
Reporting Period:	January 1, 2018 through March 31, 2018
Process Unit Description:	No. 3 Recovery Boiler
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	35%
Monitor Manufacturer(s) and Model Number(s):	Teledyne Monitor Labs / Light Hawk 560 Opacity Monitor
Last CMS Certification or Audit Date:	Certification: July 31, 2010 Audit: September 29, 2017
Total Source Operating Time in Reporting Period:	128,495 Minutes

EMISSION DATA SUMMARY

Reason for Excess Emissions	**Duration (minutes)**	
	Over 35%	Over 20% for 60 minutes
A. Startup/Shutdown	0	0
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	97	0
Fuel Problems	0	0
Other Known Cause	24	78
Other Unknown Cause	6	0
Total Number of Incidents	14	1
Excess Emissions/Process Operating Time	0.10 %	NA

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	**Duration (minutes)**
Monitor Equipment Malfunctions	20
Non-Monitor Equipment Malfunctions	0
Quality Assurance	24
Other Known Cause	0
Other Unknown Cause	0
Total Number of Incidents	2
Percent Monitor Downtime	0.03 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: David Clemmons Pulping & Utilities Operations Manager

Signature: _____

QUARTERLY REPORT SUMMARY

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

Pollutant:	Opacity
Time Period:	Minutes
Reporting Period:	January 1, 2018 through March 31, 2018
Process Unit Description:	No. 2 Lime Kiln
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	20%
Monitor Manufacturer(s) and Model Number(s):	Monitor Labs USI 550 Opacity Monitor
Last CMS Certification or Audit Date:	Certification: October 27, 2012 Audit: October 2, 2017
Total Source Operating Time in Reporting Period:	122,310 Minutes

EMISSION DATA SUMMARY

Reason for Excess Emissions	**Duration (minutes)**	
	Over 20%	Over 20% for 60 minutes
A. Startup/Shutdown	6	0
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	0	0
Fuel Problems	0	0
Other Known Cause	66	0
Other Unknown Cause	6	0
Total Number of Incidents	8	0
Excess Emissions/Process Operating Time	0.06 %	NA

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	**Duration (minutes)**
Monitor Equipment Malfunctions	1840
Non-Monitor Equipment Malfunctions	0
Quality Assurance	255
Other Known Cause	0
Other Unknown Cause	6
Total Number of Incidents	13
Percent Monitor Downtime	1.72 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: David Clemmons Pulping & Utilities Operations Manager

Signature: _____

QUARTERLY REPORT SUMMARY

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

Pollutant:	Particulate Matter
Time Period:	Hours
Reporting Period:	January 1, 2018 through March 31, 2018
Process Unit Description:	No. 2 and No. 3 Smelt Dissolving Tank Vent
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	0.2 lbs/ton BLS
Operating Parameters:	Differential Pressure > 1.5 inches of water column Liquid Flow Rate > 65 gpm
Monitor Manufacturer(s) and Model Number(s):	DP – Rosemount 3051CD2A02A1AM5E55 Liquid Flow Rate – Foxboro IMT25PDADB10N-AB
Last CMS Certification or Audit Date:	Certification: August 3, 2004 (both) Audits: 6/22/17 (DP), 12/13/17 (Flow)
Total Source Operating Time in Reporting Period:	2,061 hours

EMISSION DATA SUMMARY

Reason for Excess Emissions	**Duration (hrs)**
A. Startup/Shutdown	0
B. Malfunctions	
Process System	0
Control Equipment	0
Other Known Cause	24
Other Unknown Cause	0
Total Number of Incidents	0
Excess Emissions / Process Operating Time	1.15 %

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	**Duration (hrs)**
Monitor Equipment Malfunctions	300
Non-Monitor Equipment Malfunctions	0
Quality Assurance	0
Other Known Cause	0
Other Unknown Cause	0
Total Number of Incidents	1
Percent Monitor Downtime	0.24 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: David Clemmons Pulping & Utilities Operations Manager

Signature: _____

EXCESS EMISSIONS AND CONTINUOUS MONITORING SYSTEM PERFORMANCE REPORT

Pollutant:	Particulate Matter
Time Period:	Hours
Reporting Period:	January 1, 2018 through March 31, 2018
Process Unit Description:	No. 2 and No. 3 Smelt Dissolving Tank Vent
Company:	Resolute Forest Products – Catawba Mill
Emission Limits:	0.2 lbs/ton BLS
Operating Parameters:	Differential Pressure > 1.5 inches of water column Liquid Flow Rate > 65 gpm

§63.10(c)(5): Date/time during which the CMS was inoperative except for zero (low-level) and high-level checks:	None
§63.10(c)(6): Date/time during which the CMS was out of control:	None
§63.10(c)(7): Specific identification of each period of excess emissions and parameter monitoring exceedances, that occurs during startups, shutdowns, and malfunctions of the affected source:	Four (4) weak wash flow exceedances: • 3:00 PM to 11:41 PM on 1/19/18 (521 min) • 12:00 AM to 2:00 AM on 1/20/18 (120 min) • 6:00 PM to 11:37 PM on 1/21/18 (337 min) • 12:00 PM to 4:19 PM on 1/22/18 (259 min) One (1) weak wash flow and pump pressure exceedance: • 9:00 AM to 11:00 AM on 2/13/18 (180 min)
§63.10(c)(8): Specific identification of each period of excess emissions and parameter monitoring exceedances, that occurs during periods other than startups, shutdowns, and malfunctions of the affected source:	N/A
§63.10(c)(10): Nature and cause of any malfunction:	• 1/19/18: Low liquor in recovery boilers due to recovery of fiberline operations after artic cold temperatures and mill-wide power outage on 1/17/18. • 1/20/18: Low liquor in recovery boilers due to recovery of fiberline operations after artic cold temperatures and mill-wide power outage on 1/17/18. • 1/21/18: Low liquor in recovery boilers due to recovery of fiberline operations after artic cold temperatures and mill-wide power outage on 1/17/18. • 1/22/18: Startup of recovery boiler due to recovery of fiberline operations after artic cold temperatures and mill-wide power outage on 1/17/18. • 2/13/18: Weak wash pump tripped out.
§63.10(c)(11): Corrective action taken or preventive measures adopted:	• 1/19/18: Increased liquor and weak wash flow. • 1/20/18: Increased liquor and weak wash flow. • 1/21/18: Removed all liquor from recovery furnaces. • 1/22/18: Instituted liquor burning. • 2/13/18: Reset pump breaker.
§63.10(c)(12): Nature of the repairs or adjustments to the CMS that was inoperative or out of control:	N/A
§63.10(c)(13): Total process operating time during the reporting period:	2,061 hours
§63.8(c)(7) and (8): Reporting requirements for a CMS that is out of control:	N/A
§63.867(c): The number and duration of occurrences when the source met or exceeded the conditions in §63.864(k)(1):	The mill implemented corrective actions for each of the 5 occurrences listed for §63.10(c)(7) above (see duration of each above).
§63.867(c): The number and duration of occurrences when the source met or exceeded the conditions in §63.864(k)(2):	The mill did not exceed the conditions in §63.864(k)(2)(iv) and §63.864(k)(3) because there were only 5 incidents within the reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: David Clemmons Pulping & Utilities Operations Manager

Signature: _____